

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

IVAN REYES-ARZATE

No. 17 CR 084

Judge Harry D. Leinenweber

**GOVERNMENT'S MOTION TO
CONTINUE TRIAL DATE**

The UNITED STATES OF AMERICA, by its attorney, JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, RESPECTUFLY moves to continue the trial date currently scheduled for May 7, 2018, as follows:

1. On January 25, 2018, the Court held a status hearing and set a trial date of May 7, 2018, deadlines for *motions in limine* of April 23, 2018 and responses thereto on April 30, 2018. R. 51.
2. Due to reasons that government counsel is prepared to disclose to the Court during a status hearing on this matter, undersigned counsel will likely be unavailable for trial on the above date and, given the international nature and complexity of this case, any replacement counsel would not have sufficient time to adequately prepare for motions and trial in this case.
3. According to his counsel, defendant will not agree to this motion.
4. If the Court grants this motion, the parties will coordinate with the Court's courtroom deputy to find a new trial date as soon as practicable.

WHEREFORE, for the reasons stated herein and for those that will be set forth at a hearing on this motion, the government respectfully requests that the May 7, 2018 trial date be continued.

Respectfully submitted,

JOHN R. LAUSCH, JR.
United States Attorney

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Dated: March 19, 2018